

Alexander F. MacKinnon (SBN 146883)
Email: alexander.mackinnon@kirkland.com
Terry Huang (SBN 253691)
Email: terry.huang@kirkland.com
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Attorneys for Plaintiffs
3M Innovative Properties Company, 3M
Unitek Corporation,
and 3M Company

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

3M INNOVATIVE PROPERTIES COMPANY, a Delaware corporation, 3M UNITEK CORPORATION, a California corporation, and 3M COMPANY, a Delaware corporation,

Plaintiffs,

VS.

TP ORTHODONTICS, INC., an Indiana corporation,

Defendant.

} Judge: Hon. Ronald S.W. Lew
}
} Hearing Date: January 4, 2011
}
} Time: 10:00 a.m.
}
} Courtroom: 21

TO THE COURT, TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on January 4, 2011, at 10:00 a.m., or at the next available hearing date on Judge Lew's regularly scheduled Civil Motions calendar, in Courtroom 21 of this Court, Plaintiffs 3M Innovative Properties Company, 3M Unitek Corporation, and 3M Company will move and hereby do move this Court for an order finding Defendant TP Orthodontics, Inc. ("TPO") in violation of the Consent Judgment Order entered by this Court on May 13, 2010, and enforcing the Consent Judgment Order against TPO.

This motion is based upon this Notice of Motion, by the accompanying Memorandum of Points and Authorities, Declarations of Michael R. Lane and Terry Huang, pleadings and materials on file with the Court, and other evidence or argument as may be presented at or before the hearing on this motion.

This motion is made following the conference of counsel pursuant to L.R. 7-3, which took place on November 15, and further conferences that took place on November 23 and 29, 2010.

DATED: December 3, 2010

Respectfully submitted,

/s/ Alexander F. MacKinnon
Alexander F. MacKinnon
Terry Huang
KIRKLAND & ELLIS LLP
333 South Hope Street
Los Angeles, California 90071
Telephone: (213) 680-8400
Facsimile: (213) 680-8500

Attorneys for Plaintiffs 3M Innovative Properties Company, 3M Unitek Corporation, and 3M Company